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Comment on Proposed Rule: Travelers' Information Stations
[PS Docket No. 09-19; RM-11514; RM-11531; FCC 10-203]

My name is Michael George and I am currently a second year student at the Mercer University School of Law. Before coming to Mercer Law, I had the opportunity to work with Georgia College and State University's college radio station WGUR. The radio station is small, but then again, so is the college. During my time at GCSU, the station was only broadcasting a 37 watt signal. Since my graduation in 2009, the station has started the process of gaining approval for a stronger signal so that the program may grow, but the process is long and the equipment is expensive. My experience with WGUR's low signal strength taught me that a 37 watt FM signal does not travel very far. On a clear night, the farthest that we could pick up the signal was the Kroger parking lot two miles away. While travelers information stations operate on an AM frequency and my college station operated on an FM frequency, I have an understanding and respect for what it takes to run a radio station and just how difficult it is to work with a low signal strength.

My name is Woo Kim and I am currently a second year student at Mercer University School of Law. Before coming to Law school I had the pleasure of serving in the United States Army as an electronic warfare operator and this experience allowed me to learn quite a bit about radio waves and how they work. I understand that the information will be important for many people and there are some who may be worried about the geographic restrictions but due to the low signal strength these restrictions are unnecessary. People will depend on the information put out over the traveler's information system.

The overall call for public comment asks whether expansion of the TIS rules would create significant public benefit. Permitting the inclusion of 511 availability, AMBER alerts, NOAA weather information, public health alerts, civil defense alerts, and terror alerts will better inform, prepare, and aid in the effective mobilization of those within the broadcast range of travelers' information stations. Furthermore, removing the geographic restrictions on the stations will permit wider use. However, relinquishing complete control to local governments will not significantly benefit TIS users because the potential for a fractured system will far outweigh the benefits of a consistent federal system.

The express inclusion of 511 availability, AMBER alerts, NOAA weather information, public health alerts, civil defense alerts, and terror alerts within the permissible use rule will expand the rule to better reflect contemporary society. The notice of proposed rulemaking states that the rule has not been changed since its inception in 1977, and since then, the world, and the information it uses, has completely changed. To stay relevant, and insure use, the stations will

have to disseminate information that the people not only find necessary, but useful. Due to the instant availability of information provided by smartphones and other such internet ready mobile devices, TIS need to better comport with what the people not only need at a moment's notice. While the internet is perfectly suited for commercial enterprise, the quick and effective distribution of emergency information is best suited to AM frequencies. The rule, and proposed rule, make the excellent point that nearly everyone has access to an AM radio. This ease of access does not shut out those who are not early adopters of the more advanced technology while also providing a consistent, reliable medium by which people can access the information they will need to ensure their safety.

The desire to keep the information under local government control is the best option. Local governments will be more aware of what is going on in the location along with emergencies and information local government officials would consider important. Local governments will also have a better idea of what the people in the region will consider to be important. The local government's expertise in the regions traffic, weather and social considerations would make them far more qualified to make the decision on what information should be distributed.

Thank you for your time and consideration,
Michael George and Woo Kim